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U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

May 1, 2025

VIA ECF

Honorable Andrew L. Carter, Jr. Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Asylum Seeker Advocacy Project v. U.S. Citizenship and Immigration Services,

25 Civ. 2133 (ALC)

Dear Judge Carter:

I write jointly with counsel for plaintiff in this Freedom of Information Act (FOIA) case to provide a status report. As our last status report explained, the merits of this action and the underlying FOIA request are resolved, and the only remaining issue is plaintiff's claim for attorneys' fees and costs. Shortly before the last status report, plaintiff provided the government with a demand and supporting records. Since that time, the government has evaluated the claim, and has responded to plaintiff's demand. The parties intend to continue our discussions to see whether it is possible to resolve the claim without litigation. We therefore respectfully propose filing a joint status report in one month, or by June 2, 2025.

The parties thank the Court for its consideration of this submission.

Respectfully,

JAY CLAYTON United States Attorney

By: <u>/s/ Peter Aronoff</u>

PETER ARONOFF

Assistant United States Attorney 86 Chambers Street, 3rd floor New York, NY 10007

New York, NY 1000/ Counsel for Defendant

cc (via ECF): Counsel for plaintiff